

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

Plaintiff, Gregory Hash, by counsel, under Federal Rule of Civil Procedure 23(e)(1), respectfully moves the Court for the entry of a Preliminary Approval Order that: (1) grants preliminary approval to the proposed class action Settlement Agreement and Release, attached as Exhibit 1 to the Declaration of Lynn A. Toops (the “Settlement”); (2) certifies the Class for purposes of notice and appoints Plaintiff as Class Representative and his counsel as Class Counsel; (3) approves and directs that Notice of the proposed Settlement be given to the Class in the form and manner set forth in the Settlement; (4) sets deadlines for Class members to object to, or opt out of, the Settlement; and (5) schedules a final approval hearing on the Settlement.

Plaintiff has submitted a memorandum and declaration in support of this motion and has tendered a proposed Preliminary Approval Order. Defendant does not object to the relief requested in this motion.

WHEREFORE, Plaintiff respectfully requests that the Court enter the Preliminary Approval Order.

Dated: June 25, 2021

Respectfully submitted,

s/Lynn A. Toops

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*Counsel for Plaintiff and the proposed  
Settlement Class*

### **CERTIFICATE OF SERVICE**

I certify that on June 25, 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

s/Lynn A. Toops

Lynn A. Toops